

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACOB RAINES,
[DOB: 3/31/1979],

Defendant.

Case No. _____

COUNT ONE:

Possession of Child Pornography

18 U.S.C. §§ 2252(a)(4) & (b)(2)

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class C Felony

COUNT TWO:

**Access with Intent to View Child
Pornography Over the Internet**

18 U.S.C. §§ 2252(a)(4) & (b)(2)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class C Felony

\$100 Mandatory Special Assessment

Each Count

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about April 2, 2015, in the Western District of Missouri, JACOB RAINES, defendant herein, knowingly possessed one or more films, videotapes, and other matter which contained one or more visual depictions, which involved a prepubescent minor and a minor who had not attained 12 years of age, separate and apart from the visual depictions relied upon in Count Two, which visual depiction had been shipped and transported in interstate and foreign commerce by any means including by computer, and which were produced using materials which had been shipped and transported in or affecting interstate or foreign commerce by any

means including by computer; and the production of the visual depictions involved the use of minors engaging in sexually explicit conduct, and were visual depictions of such conduct, in violation of Title 18, United States Code, Sections 2252 (a)(4) and (b)(2).

COUNT TWO

Between on or about November 13, 2013, and March 28, 2014, in the Western District of Missouri and elsewhere, JACOB RAINES, defendant herein, knowingly accessed one or more films, videotapes, and other matter which contained visual depictions, separate and apart from the visual depictions relied upon in Count One, that had been shipped and transported in interstate and foreign commerce by any means including by computer, and which were produced using materials which had been shipped and transported in or affecting interstate or foreign commerce by any means including by computer; and the production of the visual depictions involved the use of minors engaging in sexually explicit conduct, and were visual depictions of such conduct, in violation of Title 18, United States Code, Sections 2252 (a)(4) and (b)(2).

FORFEITURE ALLEGATION

The allegations contained in Counts One and Two are realleged and are incorporated by reference herein for the purpose of alleging forfeiture of: any visual depiction described in Title 18, United States Code, Section 2252, or any film, videotape, or other matter which contains any such visual depiction, which was transported, mailed, shipped, or received in violation of these sections; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses; including, but not limited to the following:

1. A Memorex DVD with a handwritten "X" over the x in Memorex, labeled "Room K, Log No. 12";
2. A Western Digital WD3200AAKS 320 Gigabyte SATA hard drive, serial number WMAV2U331404;
3. A Dell Optiplex 980 Desktop computer with service tag 9R59RL1;
4. A Samsung MZ-7TD500 500 Gigabyte SATA SSD hard drive, serial number S14LNEACC4039H;
5. A Corsair homebuilt desktop computer with no serial number, labeled "Room K, Log Item No. 13"; and
6. A Maxtor Diamond Max 10 300 Gigabyte IDE hard drive, serial number B607ZZ1H.

All in violation of Title 18, United States Code, Section 2253.

TRUE BILL.

_____/s/ Megan M. Deleo_____
FOREPERSON OF THE GRAND JURY

_____/s/ David Luna_____
David Luna #57057
Assistant United States Attorney

Date: _____ 3/3/16 _____
Kansas City, Missouri